

# EXHIBIT A



Andrew M. Cuomo  
Governor

Maria T. Vullo  
Superintendent

STATE OF NEW YORK  
Supreme Court, County of KINGS

512454/16

Joseph Frankel and Rivky Frankel

Plaintiff(s)

against

Defendant(s)

Automobile Insurance Company of Hartford, Connecticut

RE :Automobile Insurance Company of Hartford, Connecticut

Attorney for Plaintiff(s) and Defendant(s) please take notice as follows:

Attorney for Plaintiff(s) is hereby advised of acknowledgement of service upon this Department. Summons and Complaint in the above entitled action on July 25, 2016 at Albany, New York. The \$ 40.00 fee is also acknowledged.

Original to Attorney for Plaintiff(s):

Aboulafia Law Firm, LLLC  
Murad Sardar, Esq.  
228 East 45th Street  
Suite 1700  
New York, New York 10017

Persuant to the requirement of section 1212 of the Insurance Law, Defendant(s) is hereby notified of service as effected above. A copy of the paper is enclosed.

Duplicate to Defendant:

Corporation Service Company  
Automobile Insurance Company of Hartford, Connecticut  
80 State Street  
Albany, New York 12207-2543

A handwritten signature in cursive ink that reads "Jacqueline Catalfamo".

Jacqueline Catalfamo  
Special Deputy Superintendent

Dated Albany, New York, July 25, 2016  
573800

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS

JOSEPH FRANKEL AND RIVKY FRANKEL,

Plaintiffs,

-against-

THE AUTOMOBILE INSURANCE COMPANY OF  
HARTFORD, CONNECTICUT (TRAVELERS),

Defendant.

X

Index No. 512454/16

**SUMMONS**

Plaintiffs' Address:  
1031 54<sup>TH</sup> Street  
Brooklyn, NY

*The basis of the venue  
designated is:  
Plaintiffs' Address*

X

**YOU ARE HEREBY SUMMONED** to answer the Complaint in this action and to serve a copy of your Answer on the Plaintiff's attorneys within twenty (20) days after the service of this summons, exclusive of the day of service or within thirty (30) days after the service is complete if this summons is not personally delivered to you within the State of New York and in case of your failure to Answer, judgment will be taken against you by default for the relief demanded in the annexed Complaint with interest from the date the cause of action arose, costs, disbursements and attorneys fees.

Dated: New York, NY  
July 20, 2016



Murad Sardar, Esq.  
Aboulafia Law Firm LLC  
*Attorneys for Plaintiffs*  
228 East 45<sup>th</sup> Street, Suite 1700  
New York, NY 10017  
(212) 684-1422

TO:

The Automobile Insurance Company of Hartford, CT  
(Service via Department of Financial Services)

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS

JOSEPH FRANKEL AND RIVKY FRANKEL,

X Index No. 512454/16

**COMPLAINT**

Plaintiffs,

-against-

THE AUTOMOBILE INSURANCE COMPANY OF  
HARTFORD, CONNECTICUT (TRAVELERS),

Defendant.

X

1. At all times hereinafter mentioned, Plaintiffs JOSEPH FRANKEL and RIVKY FRANKEL (hereinafter "Frankel"), are individuals who did and still do live and reside at their property located at 1031 54<sup>th</sup> Street, Brooklyn (hereinafter "Subject Premises").
2. At all times hereinafter mentioned, the Plaintiffs had and still have an ownership and insurable interest in the subject premises.
3. At all times hereinafter mentioned, Defendant THE AUTOMOBILE INSURANCE COMPANY OF HARTFORD, CONNECTICUT (TRAVELERS) (hereinafter "Travelers") was and still is a corporation authorized, licensed, admitted and/or engaged in the business of providing insurance and being an insurer in the State of New York, and located at .
4. At all times hereinafter mentioned, Defendant Travelers was and is authorized by the Department of Financial Services of the State of New York to engage in the business of insurance in the State of New York and to issue policies of insurance including the policy herein sued upon.

**AS AND FOR A FIRST CAUSE OF ACTION FOR BREACH OF CONTRACT**

5. On or about January 12, 2016, Defendant made and issued to Plaintiffs for good and valuable consideration a certain policy of insurance bearing policy number 980739071, wherein and whereby Defendant did insure the subject premises.
6. That on or about March 16, 2016, while said policy was in full force and effect, Plaintiffs suffered a loss by a covered peril of the property insured by Defendant, and as a result thereof, Plaintiffs have sustained damages in the sum of at least \$85,000.00.
7. Defendant Travelers has declined to indemnify Plaintiffs for the loss sustained although a claim has been duly made and all conditions of the policy have been met.
8. As a result of Defendant's breach of contract, Plaintiffs have been damaged in the sum of at least \$85,000.00

**WHEREFORE**, it is respectfully requested that Plaintiffs have judgment against Defendant on their First cause of action in the sum of at least \$85,000.00 with interest from March 16, 2016, for costs and disbursements of this action, and for such other relief as this Court deems just and proper.

Dated: New York, NY  
July 20, 2016



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Murad Sardar, Esq.  
Aboulafia Law Firm LLC  
*Attorneys for Plaintiffs*  
228 East 45<sup>th</sup> Street, Suite 1700  
New York, NY 10017  
(212) 684-1422

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS**

Joseph Frankel, Rivky Frankel

Plaintiff/Petitioner,  
-against-

x  
Index No. \_\_\_\_\_

The Automobile Insurance Company of Hartford,  
Connecticut (Travelers)

Defendant/Respondent.

x

**NOTICE REGARDING AVAILABILITY OF ELECTRONIC FILING  
SUPREME COURT CASES**

PLEASE TAKE NOTICE that the matter captioned above has been commenced as an electronically filed case in the New York State Courts Electronic Filing System ("NYSCEF") as required by CPLR § 2111 and Uniform Rule § 202.5-b (consensual electronic filing). This notice is being served as required by that rule.

NYSCEF is designed for the electronic filing of documents with the County Clerk and the court and for the electronic service of those documents, court documents, and court notices upon counsel and unrepresented litigants who have consented to electronic filing.

Electronic filing offers significant benefits for attorneys and litigants, permitting papers to be filed with the County Clerk and the court and served on other parties simply, conveniently, and quickly. NYSCEF case documents are filed with the County Clerk and the court by filing on the NYSCEF Website, which can be done at any time of the day or night on any day of the week. The documents are served automatically on all consenting e-filers as soon as the document is uploaded to the website, which sends out an immediate email notification of the filing.

The NYSCEF System charges no fees for filing, serving, or viewing the electronic case record, nor does it charge any fees to print any filed documents. Normal filing fees must be paid, but this can be done on-line.

**1) Parties represented by an attorney:** An attorney representing a party who is served with this Notice must promptly either consent or decline consent to electronic filing and service through NYSCEF for this case. Attorneys registered with NYSCEF may record their consent electronically in the manner provided at the NYSCEF site. Attorneys not registered with NYSCEF but intending to participate in e-filing must first create a NYSCEF account and obtain a user ID and password prior to recording their consent by going to [www.nycourts.gov/efile](http://www.nycourts.gov/efile). Attorneys declining to consent must file with the court and serve on all parties of record a declination of consent.

**2) Parties not represented by an attorney: Unrepresented litigants are exempt from e-filing. They can serve and file all documents in paper form and must be served with all documents in paper form.** However, an unrepresented litigant may consent to participate in e-filing.

For information on how to participate in e-filing, unrepresented litigants should contact the appropriate clerk in the court where the action was filed or visit [www.nycourts.gov/efileunrepresented](http://www.nycourts.gov/efileunrepresented). Unrepresented litigants also are encouraged to visit [www.nycourthelp.gov](http://www.nycourthelp.gov) or contact the Help Center in the court where the action was filed. An unrepresented litigant who consents to e-filing may cease participation at any time. However, the other parties may continue to e-file their court documents in the case.

For additional information about electronic filing and to create a NYSCEF account, visit the NYSCEF website at [www.nycourts.gov/efile](http://www.nycourts.gov/efile) or contact the NYSCEF Resource Center (phone: 646-386-3033; e-mail: [efile@nycourts.gov](mailto:efile@nycourts.gov)).

Dated: 07/20/2016

Signature

MATTHEW S ABOULAFIA

Name

Firm Name

228 East 45th Street, Suite 1700

Address

NEW YORK, NY 10017

City, State, and Zip

212-684-1422

Phone

[matthew@aboulaw.com](mailto:matthew@aboulaw.com)

E-Mail

To: \_\_\_\_\_

9/3/15

NEW YORK STATE  
DEPARTMENT *of*  
FINANCIAL SERVICES  
ONE COMMERCE PLAZA  
ALBANY, NY 12257

Corporation Service Company  
Automobile Insurance Company of  
Hartford, Connecticut.  
80 State Street  
Albany NY 122072543

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